

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

Chapter 11

In re

MOTORS LIQUIDATION COMPANY, et al.,
f/k/a General Motors Corp., et al.

Case No. 09-50026 (REG)

(Jointly Administered)

Debtors.

**APPELLANT'S STATEMENT OF ISSUES TO PRESENTED ON APPEAL AND
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009(a) of the Federal Rules of Bankruptcy Procedure, BENJAMIN W. PILLARS, as Personal Representative of the Estate of KATHLEEN ANN PILLARS, deceased, ("Pillars") as Appellant submits this statement of the issues to be presented on appeal, and designation of items to be included in the record on appeal in connection with Pillar's Notice of Appeal [Dt. No. 14001] filed on July 26, 2017.

I. Statement of Issues to be Presented on Appeal

A. Whether the Bankruptcy Court erred in finding that Pillars was a Non-Ignition Switch Plaintiff rather than an Ignition Switch Plaintiff.

B. Whether the Bankruptcy Court erred in finding that General Motors LLC ("New GM") had not admitted that Pillars was an Ignition Switch Plaintiff even though New GM's statements that Pillars was an Ignition Switch Plaintiff constitute judicial admissions.

II. Designation of Items to be Included in Record on Appeal

| Item No. | Date Filed | Title | Dkt. No. |
|----------|------------|--|----------|
| 1. | 02/27/2017 | Statement/Benjamin W. Pillars, Supplemental Opening Brief | 13857 |
| 2. | 02/27/2017 | Statement Pilgrim Plaintiffs' Supplemental Opening Brief | 13859 |
| 3. | 02/27/2017 | Statement Supplemental Opening Brief of the Elliott, Sesay and Bledsoe Plaintiffs | 13861 |
| 4. | 02/27/2017 | Notice of Objection to Claims Supplemental Opening Brief on the 2016 Threshold Issues | 13863 |
| 5. | 02/27/2017 | Statement Supplemental Opening Brief on the 2016 Threshold Issues | 13864 |
| 6. | 02/27/2017 | Memorandum of Law Opening Brief by General Motors LLC on the 2016 Threshold Issues set forth in the Order to Show Cause, Dated December 13, 2016 | 13865 |
| 7. | 02/27/2017 | Memorandum of Law/Plaintiffs' Joint Opening Brief on the 2016 Threshold Issues | 13866 |
| 8. | 04/07/2017 | Reply to Motion Reply Brief by General Motors LLC on the 2016 Threshold Issues Set forth in the Order Dated December 13, 2016 | 13888 |
| 9. | 04/07/2017 | Response/Plaintiff's Joint Reply Brief on the 2016 Threshold Issues | 13889 |
| 10. | 04/24/2017 | Transcript regarding hearing held on April 20, 2017 | 13907 |
| 11. | 05/19/2017 | Transcript regarding hearing held on May 17, 2017 | 13943 |
| 12. | 07/12/2017 | Memorandum Opinion and Order Deciding Certain 2016 Threshold Issues | 13992 |
| 13. | 07/26/2017 | Notice of Appeal filed by Pillars with respect to Memorandum Opinion and Order Deciding Certain 2016 Threshold Issues | 14001 |

Respectfully submitted,
THE MASTROMARCO FIRM

Dated: August 9, 2017

By: /s/ Victor J. Mastromarco, Jr.
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